

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF INDIANA  
INDIANAPOLIS DIVISION

SUSAN KINDER,

Plaintiff,

v.

MARION COUNTY PROSECUTOR'S  
OFFICE,

Defendant.

Case No. 1:22-cv-1952-TWP-MJD

**DEFENDANT'S PRELIMINARY LISTS OF WITNESSES AND EXHIBITS**

Defendant Marion County Prosecutor's Office, by counsel, pursuant to the Court's case management plan, ECF 16, propounds the following preliminary lists of witnesses and exhibits. These lists are subject to change as discovery unfolds.

**I. Preliminary Witnesses**

- a. Susan Kinder
- b. Lydia Richardson
- c. Shekell Henton
- d. Kimberly Rasheed
- e. Cynthia Oetjen
- f. Erin Warner
- g. Jeff Knoop
- h. Richard Veen
- i. Jill Carr
- j. Maya James
- k. Samar Nassar

- l. LaFrietta Norris
- m. Any person listed on the Plaintiff's witness lists or initial disclosures
- n. Any person identified in any document exchanged in discovery
- o. Any person whose identity is discovered during the course of discovery

## **II. Preliminary Exhibits**

- a. The Plaintiff's entire personnel file from MCPO, including job application, work history, performance reviews, etc.
- b. The Plaintiff's entire personnel files from employment prior to MCPO.
- c. Any correspondence, including but not limited to emails and instant messages, sent to or from the Plaintiff or any employee of MCPO concerning the Plaintiff's employment and work history and performance, or the MCPO generally.
- d. Documents sent to or from the EEOC to the Plaintiff/Charging Party.
- e. Written statements or complaints made by Plaintiff's colleagues concerning the Plaintiff's actions at work.
- f. Relevant job postings or descriptions.
- g. Any document describing the Plaintiff's disciplinary history or misconduct at MCPO.
- h. Notes regarding the Plaintiffs' employment and work history and performance, made by anyone.
- i. MCPO policies regarding harassment, intimidation, respect, equal employment opportunities, or anything else related to the workplace.
- j. The Plaintiff's performance reviews.

- k. Any document made in the course of investigating a hostile work environment, or other, complaint brought by any employee of MCPO that concerned the Plaintiff in any capacity.
- l. Personnel records of other MCPO employees, to the extent they relate to the Plaintiff's claims or mention the Plaintiff.
- m. Any document identified by any party in initial disclosures or exhibit lists.
- n. Any document exchanged in discovery in this case.

Respectfully submitted,

INDIANA ATTORNEY GENERAL  
Attorney No. 18857-49

Date: December 21, 2022

By: Alexander R. Carlisle  
Deputy Attorney General  
Attorney No. 34533-49

OFFICE OF THE ATTORNEY GENERAL

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*Attorney for Defendant*